

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

for the

Southern District of Texas

MAR 22 2018

United States of America

v.

Juan Guillermo Rivas-Dominguez
YOB: 1963, Mexican Citizen

David J. Bradley, Clerk

Case No. M-18-0611-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 21, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 United States Code § 952

Importing into the United States from Mexico approximately 18.56 kilograms of cocaine.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

approved by
[Signature]

[Signature]
Complainant's signature

Mandy Davis, HSI Task Force Officer
Printed name and title

Sworn to before me and signed in my presence.

Date: 3/22/2018

8:39 am

[Signature]
Judge's signature

City and state: McAllen, Texas

Peter Ormsby, U.S. Magistrate Judge
Printed name and title

Attachment "A"

I, Mandy J. Davis, am a Task Force Officer of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On March 21, 2018, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations at the Hidalgo Port of Entry (POE) in Hidalgo, Texas. CBP Officers (CBPOs) detained Juan Guillermo RIVAS-Dominguez (hereafter RIVAS), a citizen of Mexico and B1/B2 visa holder, while attempting to enter the U.S. with approximately 18.56 kilograms (kg) of cocaine concealed within the gas tank of the Ford Five Hundred passenger car he was driving. The vehicle was registered to RIVAS.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. CBPOs referred RIVAS and the vehicle to secondary inspection due to a strong odor of laundry detergent and tampering in the undercarriage of the vehicle near the heat shield.
3. During secondary inspection, CBPOs conducted a non-intrusive X-Ray inspection and discovered anomalies in the gas tank of the vehicle. A CBP K-9 narcotics detection team conducted a free air inspection which resulted in a positive alert for the odor of narcotics emanating from the vehicle.
4. Inside the gas tank, 17 vacuum sealed and cellophane wrapped packages were discovered. CBPOs field tested the substance inside the packages, which was positive for the characteristics of cocaine.
5. Homeland Security Investigations (HSI), Special Agents (SA) and a Task Force Officer (TFO) responded to the Hidalgo POE to assist in the investigation. HSI SA and TFO interviewed RIVAS who (post-Miranda warning) stated approximately one week ago he was approached by unidentified individuals that wanted to utilize his vehicle for illicit activity. RIVAS was aware that something was concealed inside the vehicle and that these individuals smuggle narcotics, currency and weapons.
6. RIVAS will be charged with Illegal Importation of a Controlled Substance, in violation of 21 USC § 952.